

David Brandenburg

March 18, 2025
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13	A P P E A R A N C E S - (Continued)	
14	ALSO PRESENT:	
15	MS. ANGELA MAYEUX (By Zoom)	
16	MR. GABE SEYMORE, Video Technician	
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1	PRELIMINARY PROCEEDINGS	
2	THE VIDEOGRAPHER: We are now on the record	
3	on March 18th, 2025 at 11:05 a.m. This is the	
4	deposition of David Brandenburg being taken in San	
5	Antonio, Texas, in the matter of Southwest Airlines	
6	versus The City of San Antonio, Texas, et al. Filed in	
7	the U.S. District Court for the Western District of	
8	Texas, San Antonio Division. And will all Counsel	
9	please state your appearances for the record.	
10	MR. MORALES: Lawrence Morales for Southwest	
11	Airlines.	
12	MS. SLIFER: LeElle Slifer --	
13	MR. GOLDBERG: Roy Goldberg -- I'm sorry.	
14	Go ahead.	
15	MS. SLIFER: Sorry. Go ahead, Roy.	
16	MR. GOLDBERG: Roy Goldberg, also, for	
17	Southwest Airlines.	
18	MS. SLIFER: LeElle Slifer with Winston	
19	Strawn, on behalf of the Deponent.	
20	MR. PILSK: Eric Pilsk from Kaplan Kirsch,	
21	on behalf of Defendants.	
22	MS. KLUN: Debbie Klun, on behalf of the	
23	Defendants.	
24	THE VIDEOGRAPHER: Will the Court Reporter	
25	please swear in the Witness.	

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<p style="text-align: right;">Page 142</p> <p>1 sent this to you on May 1st, 2024. Is this the first 2 time that you had seen it? 3 A. Yes. 4 Q. We know that there was a meeting at the ESC on 5 May 3rd, 2024? 6 A. Yes. 7 Q. Right? And a summary of this chart -- I'm sorry, 8 a summary of these worksheets were presented as part of 9 that presentation, correct? 10 A. I believe so. 11 Q. All right. In your other experience, you 12 mentioned that we were looking at the e-mail where you 13 said "Here are the priorities, based on my experience." 14 You know, one is load balancing, and then, two, 15 passenger experience, and then three is carrier wants? 16 A. Yes. 17 Q. You take care of one and two, and three will be 18 fine, right? 19 A. Yes. 20 Q. Are you aware of any other situations where the 21 factors that we see in Exhibit Number 23 were considered 22 when making gating assignments at an airport facility? 23 A. No. 24 Q. You're not aware of any? 25 A. Correct.</p>	<p style="text-align: right;">Page 144</p> <p>1 have a passenger profile that has a high percentage of 2 leisure passengers? 3 A. It makes sense. 4 Q. And for example, Southwest has more leisure 5 passengers on percentage compared to American and 6 United. Would you agree with that? 7 A. I have no direct knowledge of that. 8 Q. Nevertheless, kind of considering whether an 9 airline has more business passengers or leisure 10 passengers, do you have a view on whether that is a 11 proper or improper factor for an airport to consider 12 when making gating assignments? 13 MR. PILSK: Object to the form. You can 14 answer. 15 A. I don't understand the question. 16 Q. (BY MR. MORALES) You don't understand what 17 "passenger profile" means or "improper," "proper," what 18 else do you not understand? 19 A. I don't understand what they mean by "passenger 20 profile" as it relates to "fit." 21 Q. Okay. Let's take off the label. Do you believe 22 that whether an airline has more business or leisure 23 passengers is a proper or improper factor to consider 24 when making gating decisions at an airport? 25 MS. SLIFER: Object to form.</p>
<p style="text-align: right;">Page 143</p> <p>1 Q. Do you have any view, for example, on whether an 2 airline's fit into a particular airport is a proper or 3 improper factor to be considered when making gating 4 decisions? 5 MR. PILSK: Object to the form. You can 6 answer. 7 A. I don't understand what you mean by "fit." 8 Q. (BY MR. MORALES) Well, fortunately, somebody 9 defined it for us. If we look at Exhibit Number 23, the 10 third page, it's CoSA-16199. Do you see that? 11 A. 16199, yes. 12 Q. It says "Fit" into SAT relates to desirability 13 of passenger profile, business, leisure, mix, et cetera, 14 and airline brand position, network, ULCC, established, 15 start-up, et cetera." Do you see that? 16 A. I do. 17 Q. Do you have any view on whether considering 18 "fit," as it's defined in Exhibit Number 23 is proper or 19 improper when making gating decisions at an airport? 20 MR. PILSK: Object to the form. 21 A. I don't understand what they mean by "fit" here. 22 I have a different definition of "fit." 23 Q. (BY MR. MORALES) Okay. Well, they say it relates 24 to desirability of passenger profile, business, leisure, 25 mix, et cetera. Do you understand that some airlines</p>	<p style="text-align: right;">Page 145</p> <p>1 MR. PILSK: Join. Go ahead. 2 A. Only to the extent it impacts the balancing of 3 the terminal. 4 Q. (BY MR. MORALES) And do you have any reason to 5 believe that an air carrier's mix of business versus 6 leisure passengers impacts balancing? 7 A. Yes. 8 Q. How so? 9 A. Depending on peak-on-peak arrivals and 10 departures, the mix of passengers is very important for 11 check-in bags, curbside utilization, and security 12 checkpoint. For example, typically, your business 13 passenger for the Corgan analysis will, either, use an 14 Uber or a taxi, where leisure will park in the parking 15 garage. 16 So, that was all part of the modeling that we 17 asked Corgan to look into on what that mix would look 18 like, which led to their recommendation. 19 Q. Okay. What about whether an airline is a 20 network, a ULCC, it's an Ultra Low Cost Carrier, 21 established or start-up? What impact does that have, if 22 any, on balancing issues? 23 A. No impact. 24 Q. No impact? 25 A. None.</p>